

## **COMMUNICATIONS PLAN FOR ALLIED DISPOSAL SITE**

(Derived from notes from City Commission Administrative Committee Meeting on 10/15/2014 and the MDEQ/EPA/COK Large Group Meeting in St. Joseph, MI on October 17, 2014)

- I. Identify and communicate with key community partners
  
- II. “Tell the story of the entire journey”
  - a. “A Superfund site is born.” (1990) – The Allied Disposal Site listed on the National Priorities List. After nearly 100 years of paper making and waste disposal at or near the site that included using recycled carbonless carbon paper containing PCB-contaminated inks, the USEPA identified the Allied Disposal Site as meeting the criteria for a Superfund site.
  
  - b. “The cleanup begins.” (1998 and 1999) – A Time-Critical Removal Action (TCRA) is conducted on the Bryant Mill Pond at the north end of the Allied Superfund Site. The approximately 45,000 cubic yards is placed on top of existing waste on the site and capped. Several City officials are reassured that this is a “temporary action.”
  
  - c. “You want to put it where?” (2007) – USEPA-Region 5 proposes to place dredge PCB-contaminated sediments from the Kalamazoo River near Otsego and Plainwell at the Allied Superfund Site in Kalamazoo. The Kalamazoo community becomes very engaged. Within months, the USEPA decides to not place any additional materials at the Allied Superfund Site and other landfills are utilized.
  
  - d. “What is the plan?” (2008) – USEPA publishes Remedial Investigation (RI) for the Allied Disposal Site (Operable Unit #1 or OU-1). Considerable discussion ensues with City and consultants on numerous issues.
  
  - e. “Now what do we do?” (2008-2010) – Millennium Holdings, identified PRP for the Allied Site files for bankruptcy. In 2010, the bankruptcy is settled. Approximately \$50 million is placed in a bankruptcy trust for clean up of the Allied Superfund Site. Additional monies were also set aside (approximately \$50 million and \$2.5 million for the Kalamazoo River Superfund Site clean up and Natural Resources Damage Assessment funds respectively.)
  
  - f.
  
- III. Practical Issues Associated with the Allied Disposal Site

- a. Funding
  - b. Ownership
  - c. Redevelopment Issues and Options
  - d. Legal Issues and Concerns
  - e. CERCLA (Superfund) Process
  - f. Groundwater, wellhead protection, ongoing monitoring
  - g. Other issues (review comprehensive list and add more, if necessary)
- IV. How do we move forward as a community?
- a. A Vision for the Allied Site
    - i. Definitions:
      - 1. Protectiveness
      - 2. Productivity
      - 3. Connectivity
      - 4. Accessibility
    - ii. Portage Creek Corridor Plan
    - iii. Economic Development Opportunities
  - b. What is the best the City can expect given site issues and constraints?
  - c. City Comments and Concerns
    - i. “The City accepts the remedy but does not endorse (or embrace) it.”
    - ii. Given the constraints and lack of funding that was hoped to be available from other sources, the City feels that the selected remedy is the best way to move forward and provide productive reuse of the Allied Site.